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Van Waters & Rogers
division of Univar

REGIONAL OPERATIONS DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

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OCT 10 1985

BOX 10287
PORTLAND, OR 97210
PHONE (503) 222-1721

OR 7398
10-4-85

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GDS
JAG
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October 4, 1985

cc: NWR
Hay Waste

David B.
Mr. Fred M. Bolton
Administrator, Regional Operations
Department of Environmental Quality
522 S. W. 5th Avenue (Box 1760)
Portland, OR 97206

CERTIFIED MAIL

Dept. of Environmental Quality

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1985

RE: NOTICE OF VIOLATION HW-NWR-85-117 MULTNOMAH COUNTY
ORD 009227398

NORTHWEST REGION

Dear Mr. Bolton:

Reference is made to the violations sited in Subparagraphs A-2, B & D.

We have corrected the violations listed in the Subparagraphs as follows:

Subparagraph A-2

We are enclosing an inspection schedule plan and log which we believe meets the requirements of 40 CFR 265.15. A log is now in a three-ring notebook at the storage site.

Subparagraph B

Aisle space has been increased to allow free movement between the rows of stored drums.

Subparagraph D

We now have less than 105 drums of still bottom waste of our generation and corrosives on site. However, when Bill Hartford and myself set a 105 drum limit, that was to be only waste of our generation, i.e. still bottoms. This is easily verified in that we were not at that time handling Spent Etchant which is classified as corrosive, nor were we accumulating corrosive waste for the benefit of CCSI in 1981.

Yours very truly,

VAN WATERS & ROGERS

Jack F. Johnston

Jack F. Johnston
Vice President
Portland Area Manager

JFJ:ac

Enclosure

USEPA RCRA



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